

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

October 28, 2020

David J. Bradley, Clerk of Court

United States of America

v.

JEREMY BOYKIN
DENNIS RAY MOON
DANTE MAURICE FORESTER
DARAIEN COOPERCase No. **4:20mj2134***Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 28, 2020 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 USC 2113(a)

Aiding and Abetting Bank Larceny

This criminal complaint is based on these facts:

See attached affidavit.

TRUE COPY I CERTIFY
ATTEST: October 28, 2020
DAVID J. BRADLEY, Clerk of CourtBy: Kathy Murphy
Deputy Clerk☒ Continued on the attached sheet.*Complainant's signature*

Christopher M. LeVrier

Printed name and title

Sworn to before me telephonically.

Date: 10/28/2020*Judge's signature*City and state: Houston, Texas

Dena Hanove Palermo United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Task Force Officer Christopher M. LeVrier, affiant, hereby depose and state the following:

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI) and a Police Officer with the Houston Police Department (HPD) and have been employed by HPD since December of 2011. During my employment with HPD and the FBI, I have trained in investigations relating to violations of the United States Federal Criminal Code, including Title 18 of the United States Code, specifically criminal violations involving organized crime, bank robbery and theft, kidnapping, interference with commerce by threats or violence, and extortions. I am currently assigned to the Houston Division of the FBI, Multi Agency Gang Task Force (MAGTF) and have been since February of 2018. My primary investigative responsibilities include crimes occurring within the United States District for the Southern District of Texas. Through these investigations as well as my previous training, I have become familiar with the patterns of activity regarding ATM theft suspects and the methods they employ to plan, coordinate, and conduct these thefts.

2. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

3. This affidavit is being submitted in support of a criminal complaint and arrest warrant. Your Affiant states that there is probable cause to believe that JEREMY BOYKIN, DENNIS RAY MOON, DANTE MAURICE FORESTER, also known as DANTE MAURICE FORTSON, and DARAIEN COOPER have committed the offense of Aiding and Abetting Bank Larceny, in violation of Title 18, United States Code Section 2113(a).

PROBABLE CAUSE

4. Affiant has been participating in a proactive surveillance operation investigating several suspects believed to be involved in ATM larcenies. During the course of this investigation, on the morning of October 26th, 2020, affiant observed JEREMY BOYKIN in a white Dodge Journey bearing Texas License Plate NBF2560. This vehicle is an Avis rental car. Based on my training, experience and knowledge of this investigation, I know that these suspects often rent vehicles to conduct surveillance prior to an ATM larceny. These vehicles are then used during the execution of the ATM larceny and returned after a successful larceny. Affiant observed the Dodge Journey casing several Chase ATMs in the area of Airline Drive and Tidwell Road in Houston. Affiant observed the Dodge Journey circling the area of Chase ATMs and making several passes by the ATMs for over an hour before leaving the area. Affiant followed the vehicle back to the area of Luzon Street and Chapman Street. Based on prior surveillance of BOYKIN, affiant believes this is the area where BOYKIN lives.

5. On the morning of October 27th, 2020 at approximately 0100 hours, affiant observed a red F-250 bearing Texas License Plate Number LCP7405 parked in a vacant lot on the Northeast corner of Luzon Street and Chapman Street. Affiant believed that the F-250 was stolen due to the proximity of BOYKIN's suspected location and the fact the registered owner's address was not near the vehicle's current location. Based on my training, experience, and knowledge of

this investigation, I know that these suspects often utilize a stolen $\frac{3}{4}$ ton truck like a Ford F-250 to commit these larcenies. These larger trucks are needed to utilize hooks and chains to defeat the internal ATM safe. These trucks are often stolen prior to the larceny, stashed at a location, then utilized during the larceny, and abandoned immediately after. Affiant observed the F-250 at the location until approximately 0400 hours when surveillance was ended. At approximately 0700 hours on October 27th, 2020, the registered owner reported the F-250 stolen. Affiant attempted to locate the F-250 at the same location on the evening of October 27th, 2020 but the vehicle was no longer parked in the area of Luzon Street and Chapman Street.

6. On October 28th, 2020 at approximately 0340 hours, Comerica Bank security monitoring personnel observed the attempted larceny of the Comerica Bank ATM Machine located at 2201 Mangum Road, Houston, Texas. Comerica Bank security personnel observed three male suspects breaking into the ATM and contacted the police. Affiant along with additional law enforcement officers had been working overnight for the past several weeks on a proactive ATM Robbery assignment throughout the City of Houston and were alerted by dispatch to the in-progress ATM larceny at the location. HPD Sgt. Chippi was in the area of the call in an unmarked HPD vehicle and observed the males running from the F-250 and getting into the a Dodge Journey bearing Texas License Plate NBF2560, the vehicle that BOYKIN was previously identified in, on the 2300 block of Karbach Street, in vicinity of the Comerica Bank. After Sgt. Chippi observed the suspects enter the Dodge Journey, he called for marked HPD units to stop the vehicle. Marked HPD units responded, attempted to stop the vehicle, and a vehicle pursuit ensued. The pursuit began near the intersection of Mangum Road and 290 Service Road, lasted approximately 20 minutes covering over 17 miles reaching speeds close to 90 miles per hour and ended at Bonham

Street and I-10E Service Rd, where HPD Officers had to conduct a pursuit intervention technique (PIT) maneuver to force the vehicle to stop and end the pursuit.

7. DENNIS RAY MOON exited the front passenger seat of the vehicle, began to run on foot, and was quickly taken into custody after a brief foot pursuit. MOON was wearing a black jacket with White Hoodie. JEREMY BOYKIN was called out of the driver seat and taken into custody without incident. DANTE MAURICE FORESTER was called out of the rear passenger seating area of the vehicle from behind the driver seat and taken into custody without incident wearing a black hoodie with the “Champion” logo in white lettering across the front. DARAIEN COOPER was called out of the rear passenger seating area of the vehicle from behind the front passenger seat and taken into custody without incident and was found to be wearing a black hoodie with white Nike emblem on it.

8. Officers reviewed the surveillance video from the Comerica Bank. COOPER, FORESTER, and MOON were observed driving up to the ATM in the stolen red F-250. COOPER is seen on video exiting the stolen pickup truck at 0336 hours and approaching the ATM with a crowbar wearing a black hoodie with a small white Nike emblem on it, the same sweatshirt he was wearing when arrested. COOPER’s face was exposed as he was not wearing a mask. COOPER is then seen on video attempting to pry open the ATM “shell” or “beauty hatch” as FORESTER appears on camera and attempts to assist COOPER in prying open the ATM. FORESTER was wearing a black hoodie with “Champion” in white lettering across the front, the same sweatshirt he was wearing when arrested. MOON is observed exiting the vehicle from a separate camera angle and was observed on surveillance camera wearing a black jacket over a white colored hoodie, the same clothing he was wearing when arrested.

9. The suspects are seen prying open the ATM shell and then using J-hooks attached with chains to the back of the stolen truck to attempt to pull open the safe of the ATM multiple times, causing significant damage to the ATM. After the third attempt, the chain is seen breaking and the males are observed grabbing the J-hooks and getting back into the stolen pickup truck. The white Dodge Journey was seen on surveillance video on the street in the background of the security video.


10. Based on the foregoing facts, your affiant believes that probable cause exists for the issuance of a complaint and arrest warrant for JEREMY BOYKIN, DENNIS RAY MOON, DANTE MAURICE FORESTER, also known as DANTE MAUREICE FORTSON, and DARAIEN COOPER charging them with Aiding and Abetting Bank Larceny, in violation of Title 18, United States Code Section 2113(a).

Respectfully submitted,



Christopher M. LeVrier
Task Force Officer
Federal Bureau of Investigation

Subscribed and Sworn to me by telephone on October 28th, 2020, and I find probable cause.



Dena Hanove Palemro
United States Magistrate Judge
Southern District of Texas

UNITED STATES DISTRICT COURT

for the

Southern District of Texas



United States of America

v.

JEREMY BOYKIN

Case No. **4:20mj2134-1**Defendant

TRUE COPY I CERTIFY
 ATTEST: October 28, 2020
 DAVID J. BRADLEY, Clerk of Court
 By: Kathy Murphy
 Deputy Clerk

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) JEREMY BOYKIN

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Aiding and Abetting Bank Larceny, in violation of Title 18, United States Code Section 2113(a).

Date: 10/28/2020Dena Palermo

Issuing officer's signature

City and state: Houston, TexasDena Hanove Palemro United States Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Southern District of Texas



United States of America

v.

DENNIS RAY MOON

Case No. **4:20mj2134-2***Defendant***ARREST WARRANT**

TRUE COPY I CERTIFY

ATTEST: October 28, 2020

DAVID J. BRADLEY, Clerk of Court

By: Kathy Murphy
Deputy Clerk

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) DENNIS RAY MOON

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
☒ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

Aiding and Abetting Bank Larceny, in violation of Title 18, United States Code Section 2113(a).

Date: 10/28/2020Dena Palermo*Issuing officer's signature*City and state: Houston, TexasUnited States Magistrate Judge*Printed name and title***Return**This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Southern District of Texas



United States of America

v.

DANTE MAURICE FORESTER
(ALSO KNOWN AS DANTE MAURICE FORTSON)Case No. **4:20mj2134-3***Defendant***ARREST WARRANT**

TRUE COPY I CERTIFY

ATTEST: October 28, 2020

DAVID J. BRADLEY, Clerk of Court

By: Kathy Murphy Deputy Clerk

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) DANTE MAURICE FORESTER

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Aiding and Abetting Bank Larceny, in violation of Title 18, United States Code Section 2113(a).

Date: 10/28/2020Dena Palermo*Issuing officer's signature*City and state: Houston, TexasUnited States Magistrate Judge*Printed name and title***Return**This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

UNITED STATES DISTRICT COURT

for the

Southern District of Texas



United States of America

v.

DARAIEN COOPER

Case No.

4:20mj2134-4

*Defendant*TRUE COPY I CERTIFY
ATTEST: October 28, 2020
DAVID J. BRADLEY, Clerk of CourtBy: Kathy Murphy
Deputy Clerk

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) DARAIEN COOPER

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
☒ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

Aiding and Abetting Bank Larceny, in violation of Title 18, United States Code Section 2113(a).

Date: 10/28/2020
Dena Palermo
 Issuing officer's signature
City and state: Houston, Texas
United States Magistrate Judge
 Printed name and title

Return

 This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

 Arresting officer's signature

 Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____